

SH2_Answer_to_Cross-Claims_of_StopAndStor.doc F1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EASYTEX CORPORATION LIMITED,

Plaintiff,

-against-

PETER & FRANK OF NY, CORP., CHUL
KYU KIM a/k/a KIM CHUL KYU a/k/a
CHUK CHUL KIM a/k/a ROBERT CHUL
KIM a/k/a CHUL KYOO KIM a/k/a
CHULKYOO KIM a/k/a KIM K. CHUL,
BARO SHIPPING CO., LTD., TOP TEN
TRANS, INC., GFA, INC., 3 WIN INC.,
MERCURY, AMERICAN INTERNATIONAL
LINE, INC., SOON CHAN HONG a/k/a
SOON C. HONG a/k/a SOONCHAN C.
HONG a/k/a SOON CHAN HONG a/k/a
CHAN S. HONG a/k/a HONG S. CHAN
a/k/a HONG SOON CHANG d/b/a
SOONCHAN HONG CUSTOM HOUSE
BROKER, STOP & STOR, NEXXON
TRADING, INC., SOLUTION USA, INC.,
GAVIN FASHION, INC., KOREA
EXPRESS USA, JKM USA, CORP.,
WESTY STORAGE CENTERS, jointly and severally,

Defendants.

ECF CASE

07 CV 3907 (BSJ)

ANSWER TO CROSS-CLAIMS
OF DEFENDANT STOP & STOR --
BY CO-DEFENDANT AMERICAN
INTERNATIONAL
LINE, INC. (d/b/a Mercury) .

(Jury Demand)

Carl E. Person, appearing on behalf of the Defendant, **American International Line, Inc.**, also, sued herein under its trade name "**Mercury**" (hereinafter, "American" or "Defendant"), respectfully alleges as and for American's **Answer to the Cross-Claims of Co-Defendant Stop & Stor** (hereinafter, "Stop & Stor") asserted in Stop & Stor's Answer to the Plaintiff's First Amended Verified Complaint (the "Stop & Stor Cross-Claim Pleading"):

1. DENIES each of the allegations in paragraph 169 of the Stop & Stor Cross-Claim Pleading, and further DENIES that American has any liability for apportionment of damages or

other liability to co-defendant Stop & Stor or any other party as alleged in paragraph 169 of said pleading.

2. DENIES each of the allegations in paragraph 170 of the Stop & Stor Cross-Claim Pleading, and further DENIES that American has any liability for indemnification to co-defendant Stop & Stor or any other party as alleged in paragraph 170 of said pleading.

WHEREFORE, American respectfully requests that the Stop & Stor Cross-Claim Pleading against American be dismissed in its entirety, with costs and attorneys' fees.

Jury Demand

American hereby demands a trial by jury of all issues properly triable to a jury pursuant to Rule 38(b) of the Federal Rules of Civil Procedure.

**Dated: New York, New York
July 15, 2008**



**Carl E. Person (CP 7637)
Attorney for Defendant, American
International Line, Inc. (also sued herein
under its trade name "Mercury")
325 W. 45th Street - Suite 201
New York, New York 10036-3803
(212) 307-4444**

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing

**ANSWER TO CROSS-CLAIMS OF STOP & STORE-- BY
CO-DEFENDANT AMERICAN INTERNATIONAL LINE, INC. (d/b/a Mercury)**

was served on the respective attorneys for the Plaintiff and Co-Defendants by causing the same to be delivered by first class mail, postage pre-paid to:

Chull S. Park, Esq.
Hyun Suk Choi, Esq.
The Park Law Group, LLC
23 S. Warren Street - 2nd Floor
Trenton NJ 08608

Jeffrey S. Stephens, Esq.
Jeffrey S. Stephens, P.C.
14 Duncan Drive
Greenwich CT 06831

Hendrick Vandamme, Esq.
Patrick Joseph Maloney, Esq.
Law Offices of Harvey & Vandamme
90 Broad Street – Suite 2202
New York NY 10004

David Yita Loh, Esq.
Cozen O’Conner
45 Broadway Atrium – Suite 1600
New York NY 10006

Henry P. Gonzalez, Esq.
Rodriguez O’Donnell Gonzalez & Williams, P.C.
1211 Connecticut Avenue, N.W. – Suite 800
Washington DC 20036

An electronic copy was also forwarded via email to the above counsel at:

cpark@theparklawgroup.com; hchoi@theparklawgroup.com; patmal@safeco.com; dloh@cozen.com;
henvan@safeco.com; gonzalez@rorfgw.com; jss50@mail.com

Dated: July 15, 2008



Carl E. Person (CP 7637)